# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

#### IN THE MATTER OF:

PETITION OF NPCR, INC.,	)	CASE NO. <b>2003-00143</b>
D/B/A NEXTEL PARTNERS FOR	)	<b>36</b>
ESIGNATION AS AN ELIGIBLE	)	
TELECOMMUNICATIONS CARRIER IN	)	
THE COMMONWEALTH OF KENTUCKY	)	

## NEXTEL PARTNERS' PETITION FOR CONFIDENTIAL TREATMENT

NPCR, Inc. d/b/a Nextel Partners ("Nextel Partners"), by its undersigned counsel, and pursuant to 807 KAR 5:001, Section 7, hereby petitions the Kentucky Public Service Commission ("PSC") for an Order granting confidential treatment to Nextel Partners' certain responses to ITG's Supplemental Information Requests and states as follows:

1. Nextel Partners seeks to file: (1) a map depicting its cell site locations in and around the area served by ITG companies; and (2) two maps showing anticipated signal propagation following 2004 network expansion. The disclosure of such proprietary information would result in irreparable competitive harm to Nextel Partners by providing its competitors with a non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information, and the Regulations of the PSC contemplate the filing of such information under Confidentiality Order in proceedings such as this. Additional grounds for this requested relief are stated in the attached affidavit of Gregory Diamond as an authorized representative of Nextel

2. ITG and Nextel Partners have executed a Confidentiality Agreement, and Nextel Partners will produce this information to ITG's counsel subject to that agreement.

WHEREFORE, Nextel Partners respectfully requests that the PSC enter all necessary Orders granting confidential treatment to the Confidential Data.

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Y KOUN I JOSUMINO ATTORNEYS FOR NPCR, INC. d/b/a NEXTEL PARTNERS

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by U.S. mail on this the 13th day of February, 2004, to the following:

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